

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to case nos.:  
18-cv-09840 and 18-cv-09841.

**DECLARATION OF NEIL J. OXFORD IN SUPPORT OF PLAINTIFF  
SKATTEFORVALTNINGEN'S OPPOSITION TO DEFENDANTS'  
MOTION IN LIMINE**

I, Neil J. Oxford, an attorney duly admitted to practice law before the courts of the State of New York, hereby declare under penalty of perjury:

1. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the transcript of the deposition of Stacey Kaminer, dated April 19, 2021.
2. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the transcript of the deposition of Andrew Wall, dated February 23, 2022.
3. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the deposition of Graham Wade, dated March 16, 2022.
4. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the deposition of Emre Carr, dated April 1, 2022.
5. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript of the deposition of Adam Warren, dated April 5, 2022.
6. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the transcript of the deposition of Max Hayden, dated April 13, 2022.

7. Attached hereto as Exhibit 7 is a true and correct copy of the Expert Report of Adam Warren, dated Dec. 31, 2021.

8. Attached hereto as Exhibit 8 is a true and correct copy of the Expert Report of Max Hayden, dated Feb. 1, 2022.

9. Attached hereto as Exhibit 9 is a true and correct copy of the Reply Expert Report of Adam Warren, dated Feb. 28, 2022.

10. Attached hereto as Exhibit 10 is a true and correct copy of the Letter from Rosenblatt to Pinsent Masons, dated Jan. 11, 2021.

11. Attached hereto as Exhibit 11 is a true and correct copy of the Rosenblatt Investigation into Danish trading activity of ED&F Man Professional Trading (Dubai) Ltd (“MPT Dubai”), dated June 21, 2019 (bates stamped ED&F-00609800).

12. Attached hereto as Exhibit 12 is a true and correct copy of the Rosenblatt Investigation into Danish trading activity of ED&F Man Professional Trading (Dubai) Ltd (“MPT Dubai”), dated September 16, 2019 (bates stamped ED&F-00609825).

I, NEIL J. OXFORD, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
June 30, 2022

/s/ Neil J. Oxford  
Neil J. Oxford